

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF VIRGINIA  
DANVILLE DIVISION**

**GWENDOLYN SMALLS, as Administratrix  
of the Estate of LINWOOD RAYMOND  
LAMBERT, JR., deceased,**

Plaintiff,

**Civil Action No. 4:15CV00017**

v.

**CHIEF OF POLICE, JAMES W. BINNED,  
COLONEL,  
Individually and in his official capacity, et als.,**

Defendants.

**SECOND MOTION FOR SANCTIONS**

COME NOW DEFENDANTS, Chief of Police, James W. Binner, Colonel, Deputy Chief of Police, Brian K. Lovelace, Town of South Boston, Corporal Tiffany Bratton, Officer Clifton Mann and Officer Travis Clay and request that this Court enter an Order sanctioning Plaintiff's attorneys whose names appear on Plaintiff's Amended Complaint (ECF#46) for the unfounded, inflammatory and outrageous allegation that Linwood Lambert, Jr. was murdered by Defendants.

**CHIEF OF POLICE, JAMES W. BINNED,  
COLONEL, ET ALS.**

By Counsel

COUNSEL:

s/ Michael A. Nicholas  
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**CERTIFICATE OF MAILING**

I hereby certify that on the 18<sup>th</sup> day of September 2015, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system which will send notification of such filing to the following:

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s/ Michael A. Nicholas \_\_\_\_\_